

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

CHERYL SAGATAW and
DEANTHONY BARNES, *on behalf of
themselves and a class of
similarly-situated individuals,*

Plaintiffs,

vs.

MAYOR JACOB FREY, *in his
individual and official capacity,*

Defendant.

Civil Action No.
0:24-cv-00001-ECT/TNL

**DECLARATION OF AARON
JOHNSON IN SUPPORT OF
COMPLAINT AND MOTION
FOR TEMPORARY
RESTRAINING ORDER**

DECLARATION OF AARON JOHNSON

I, Aaron Johnson, pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is Aaron Johnson. I am 41 years old.
2. I am a documentary filmmaker and independent journalist. For years I have documented dozens of evictions of unhoused people and their encampments. In the past year, I have been working on a documentary film specifically covering the encampments in Minneapolis.
3. In late August 2023, I was present during the eviction, displacement, and destruction of the encampment at the Wall of Forgotten Natives. I was present to witness these events, and in the course of doing so, I also offered my support to displaced residents. This included helping people move their belongings to what became Camp Nenookaasi. Since that day, my work has focused on Camp Nenookaasi—hearing their stories and documenting their experiences.
4. It is difficult to completely describe Camp Nenookaasi, because it is so many things to so many people. It is a landing pad, a place of consistency and stability, a beginning foundation for dozens of people. It is a connecting point, a crucial stepping stone. It is, above all other things, necessary.
5. Camp Nenookaasi provides an alternative to struggling on the street, and as a result, being in constant distress. Without stability and consistency in your environment, you cannot have stability and consistency in your life. When your life is in chaos, you live moment to moment without a plan. When you don't know where you're going to stay that night, you make all of your choices based on securing a place to sleep that night or get high to forget that reality. You're not able to think about a long-term plan for stable housing, a plan for a job, a plan for sobriety, or anything other than surviving that moment.
6. I understand these realities first-hand, because I myself have experienced addiction and homelessness. I was a severe alcoholic for more than a decade, and struggled with housing insecurity from 2003 to 2019. I'm now 4 ½ years sober. I stopped drinking in July 2019, and it is no coincidence that I had just then gotten my own sublet apartment at that time. It was the first time in a long time that I had had a safe, stable place to come home to. It was the stability that I needed, the stability that allowed me to get sober.

7. It took me a long time to find that kind of stability. I have no doubt that if I had had access to a place like Camp Nenookaasi when I was experiencing homelessness and struggling with addiction, it would have made a difference for me. That's part of why I feel so strongly about Camp Nenookaasi. For me, housing stability was the first necessary step to getting sober.
8. Camp Nenookaasi provides people with food and shelter, and when residents have that security it creates space to focus on other things like a plan for sobriety and permanent housing. At Camp Nenookaasi, you're also surrounded by people who are going to treatment and getting into housing and showing that path. Camp Nenookaasi provides that stability that is a stepping stone to everything else.
9. The Camp is a place where people say hello and acknowledge your existence, reminding you that you are part of a community and not alone. It's the difference between being treated like a rat in a gutter that people step over without seeing and being a person with a story and a trajectory and a vision for the future. Being seen itself is so important.
10. Camp Nenookaasi also is a place of cultural reclamation, a place of Indigenous teachings and traditions, as Nicole and others have spoken about. Though I am not Native, I have witnessed this too, observing ceremonies and learning Indigenous teachings and traditions there.
11. Camp Nenookaasi is a place that unites communities and provides so much more support for the community beyond housing. It also is a hub to connect to resources. It is a particularly welcoming place for elders and physically disabled folks. I myself am disabled, rely on social security, and experience food insecurity—Camp Nenookaasi is a place I know I can come and eat.
12. Government-funded services like Avivo, housing, health and mental health services have also been able to find and better connect with their clients at Camp Nenookaasi. In my conversations with various government-funded outreach workers, their high caseload can be a major barrier to doing their job. When someone they're trying to coordinate housing for is displaced or goes missing, it's all too easy for overwhelmed workers with a backlog of other clients in emergency situations to let them slip through the cracks. A lot of people don't have reliable phone and internet access. Camp Nenookaasi has been a place that outreach workers can go and connect with people consistently. That's why Camp Nenookaasi has been so successful at helping people get permanent housing—80+ residents in a few months. These are unheard of numbers.

13. Nenookaasi is also a public health hub. It is a place for needle exchange, a place where people can access naran, condoms, hand sanitizer, gloves, and other public health resources.
14. When I learned of Mayor Frey's eviction notice, I felt betrayed. I had met with Guthrie Byard, the newly appointed disability coordinator for the City of Minneapolis and discussed with him the number of disabled people living here and the Camp's importance. We had met with Enrique Velazquez, the City's newly confirmed Regulatory Services Director, and given countless testimonies to the Chief Information Officer Eric Hanson about the importance of Camp Nenookaasi, and they expressed their commitment to working with the community. For the Mayor to issue an eviction notice when the City knows people are getting housing, people are getting into treatment, felt like a betrayal and a misuse of taxpayer dollars, spending thousands and millions of dollars money to bulldoze people's homes. In response to this news, I contacted the Mayor's office and spoke at the City Council's budget hearing, asking that the eviction notice be rescinded or at least postponed.
15. In the course of my work, I have witnessed more than twenty evictions of various housing encampments. These evictions are chaotic and disorganized. They take place early in the morning, displacing dozens of people well before the Shelter Connect hotline is even open at 10:00 a.m.
16. The last eviction I observed occurred on December 6, 2023. People I interviewed there indicated roughly 100 people were evicted, and that number approximately matched my visual estimation. The evictions occurred early, before Shelter Connect was open, and there was only one Hennepin County shelter worker who was present. When the Shelter Connect hotline opened, they indicated there were only three beds available, all for people under 21 years old, two of those beds designated female-only.
17. If Camp Nenookaasi is destroyed the harm will be significant and irreparable. I have personally researched Hennepin County records and observed that following evictions of large housing encampments, overdoses go up and Hepatitis C infections go up. When you lose your stability, it is easy to lose hope. People's belongings will be destroyed by bulldozers. People will be vulnerable to frostbite, infection, traffickers, and drug dealers. And people will get high to cope with the trauma of losing their home, their security, and their community. Stripping hope from people who have struggled against hopelessness so long is violence, and for some it will be a death sentence.

I declare under penalty of perjury that this declaration is true and correct.

Executed on December 14, 2023, in the City of Minneapolis, County of Hennepin, State of Minnesota, Treaty-Ceded Territory of the Dakota peoples.

A handwritten signature in dark ink, appearing to read 'Aaron Johnson', with a stylized, cursive script.

Aaron Johnson